

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: LADY FOREST FARMS, INC.  
Debtor**

**CHAPTER 11  
CASE NO. 11-01259-NPO**

**MOTION FOR EXTENSION OF TIME WITHIN WHICH  
TO FILE REQUIRED DOCUMENTS**

COMES NOW Lady Forest Farms, Inc. (the "Debtor"), and files this its Motion for Extension of Time Within Which to File Required Documents (the "Motion"), and in support thereof, would show unto this Honorable Court as follows, to-wit:

1. On April 4, 2011, the Debtor herein filed with this Court its Voluntary Petition for bankruptcy under Chapter 13 of the Bankruptcy Code.

2. The Debtor is required to file its Statement of Financial Affairs, Schedules, and List of Equity Security Holders (the "Required Documents") on or before Tuesday, April 19, 2011. The Debtor and its counsel have diligently attempted to gather the information necessary to complete the Required Documents and file them in a timely manner. However, because of the extent of the information involved, the Debtor and its counsel have not been able to do so.

3. The Debtor, therefore, seeks an extension of time to file the Required Documents. The granting of this extension of time will not significantly delay the progress of this matter, and the required documents will be filed before the Meeting of Creditors pursuant to 11 U.S.C. Section 341(a), which has been set for Friday, May 6, 2011, in this case, so that the creditors will have sufficient time to examine and review the required documents prior to said Meeting.

4. This extension of time is not sought for purposes of delaying this case before this Court, and the granting of the Motion will not prejudice any creditor or grant any unfair advantage to the Debtor.

5. The Debtor requests that this Court grant it an extension until and including Friday, April 29, 2011, within which to file the Required Documents.

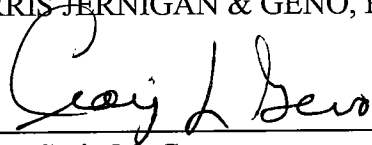
WHEREFORE, PREMISES CONSIDERED, the Debtor requests that this Court grant it an extension until and including Friday, April 29, 2011, to file the Required Documents.

THIS, the 19<sup>th</sup> day of April, 2011.

Respectfully submitted,

LADY FOREST FARMS, INC.

By Its Attorneys,  
HARRIS JERNIGAN & GENO, PLLC

By   
Craig M. Geno

OF COUNSEL:

Craig M. Geno, Esq. - MSB No. 4793  
HARRIS JERNIGAN & GENO, PLLC  
587 Highland Colony Parkway (39157)  
Post Office Box 3380  
Ridgeland, MS 39158-3380  
601-427-0048 - Telephone  
601-427-0050 - Facsimile

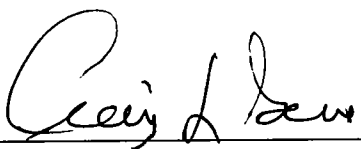
F:\Users\Bankrupt\Forest Packing-Lady Forest\Lady Forest Farms\Pleadings\Schedules\Extension\Motion.wpd

**CERTIFICATE OF SERVICE**

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing to the following:

Ronald H. McAlpin, Esq.  
Office of the United States Trustee  
Ronald.McAlpin@usdoj.gov

THIS, the 19<sup>th</sup> day of April, 2011.

  
Craig M. Geno

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FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

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**EXHIBIT "A"**

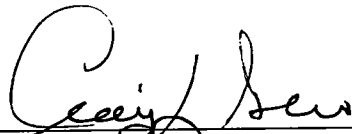
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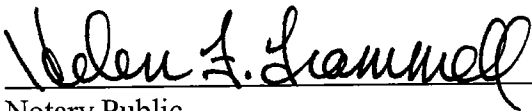
**AFFIDAVIT**

PERSONALLY APPEARED BEFORE ME, the undersigned authority, in and for the jurisdiction aforesaid, Craig M. Geno (the "Affiant") of Harris Jernigan & Geno, PLLC, of Post Office Box 3380, Ridgeland, MS 39218-33380, attorneys for the Debtor, who after having been first by me duly sworn, states on oath that this Affidavit is submitted in support of the Debtor's Motion for Extension of Time Within Which to File Required Documents (the "Motion"), and that the Motion for additional time to compile and complete documents in order to properly present the Debtor's position in this case is a reasonable one. Affiant hereby makes request for the extension of time requested in the Motion.

  
\_\_\_\_\_  
Craig M. Geno

STATE OF MISSISSIPPI  
COUNTY OF MADISON

SWORN TO AND SUBSCRIBED BEFORE ME, this the 19<sup>th</sup> day of April, 2011.

  
\_\_\_\_\_  
Notary Public

My Commission Expires 5-30-11

